

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: VERONICA DENISE MAISE

) Case No. 15 B 31647
)
Debtor) Chapter 13
)
) Judge: JACQUELINE P COX

NOTICE OF MOTION

VERONICA DENISE MAISE

4204 MAIN STREET
SKOKIE, IL 60076

SULAIMAN LAW GROUP LTD
via Clerk's ECF noticing procedures

Please take notice that on January 11, 2016 at 10:30 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on December 11, 2015.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On September 16, 2015 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed .
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by:

Provide trustee with proof of income such as
P & L statements for last 3 months, and amend plan
to provide interest to unsecured creditor due to
equity in real estate.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn